



## **ANTI-SLAVERY POLICY STATEMENT**

Modern slavery is a crime. People who commit modern slavery deprive others of their freedom and basic rights for their own benefit or profit. Modern slavery can take different shapes, such as forcing people into slavery, servitude, labour, or trafficking.

We at SET Healthcare do not tolerate any form of modern slavery in our business or in our supply chains. We act with honesty and integrity in all our business activities and relationships, and we have effective systems and controls to prevent modern slavery from happening anywhere in our operations or supply chains. We also make sure that our business and our supply chains are transparent about how we tackle modern slavery, as required by the Modern Slavery Act 2015.

We require all our contractors, suppliers, and other business partners to meet the same high standards as we do and to not use any kind of forced, compulsory or trafficked labour, or anyone in slavery or servitude, whether adults or children. We will add this requirement to our contracting processes in the next year and we expect our suppliers to do the same with their own suppliers. This policy covers everyone who works for us or on our behalf in any role, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy is not part of any employee's employment contract, and we can change it at any time.

### **Policy responsibility.**

SET Healthcare is responsible for making sure this policy follows our legal and ethical obligations, and that everyone under our control follows it.

SET Healthcare oversees putting this policy into practice, checking how it works and how effective it is, answering any questions about it, and auditing internal control systems and procedures to make sure they prevent modern slavery. Managers at all levels are responsible for making sure their staff know and follow this policy and get enough and regular training on it and the issue of modern slavery in supply chains. We welcome your feedback on this policy and how we can improve it. Please share your comments, suggestions, and questions with the Managing Director.



## **Compliance with the policy**

You must read, understand, and follow this policy. It is your responsibility to help prevent, detect, and report modern slavery in any part of our business or supply chains if you work for us or under our control. You must not do anything that might cause or suggest a violation of this policy. You must tell your line manager OR a company Director as soon as possible if you think or suspect that this policy has been or might be broken.

You should speak up about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier level as soon as you can. If you think or suspect that this policy has been or might be broken, you must tell your line manager or company Director OR report it according to our Whistleblowing Policy as soon as possible.

You should know that when appropriate, and with the welfare and safety of local workers as a priority, we will offer support and guidance to our suppliers to help them stop coercive, abusive, and exploitative work practices in their own business and supply chains.

If you are not sure whether a certain act, the treatment of workers in general, or their working conditions within any level of our supply chains is a form of modern slavery, ask your line manager or company Director.

We want to promote openness and we will support anyone who reports genuine concerns in good faith under this policy, even if they are wrong. We are committed to making sure no one suffers any negative treatment for reporting in good faith their suspicion that modern slavery of any kind is or may be happening in any part of our own business or in any of our supply chains.

Detrimental treatment means being fired, disciplined, threatened, or treated unfairly for raising a concern. If you think that you have suffered any such treatment, you should tell your line manager right away. If the problem is not fixed, and you are an employee, you should use our Grievance Procedure to raise it formally, which you can find in the current employee handbook.

### **Policy communication & awareness**

Training on this policy and on the risk of modern slavery in our supply chains is part of the induction process for everyone who works for us, and updates will be given using established ways of communication between the business and you. We must tell all suppliers, contractors, and business partners that we do not tolerate any form of modern slavery when we start our business relationship with them and remind them as needed afterwards.

### **Policy breaches**

Any employee who breaks this policy will face disciplinary action, which could lead to dismissal for misconduct or gross misconduct. We may end our relationship with other people and organisations who work for us or on our behalf if they break this policy.

Signed Off

By: Commercial Director - Rob Everist, © 2022